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February 11, 2002

## Via Electronic Mail

Gloria Blue
Executive Secretary
Trade Policy Staff Committee
Office of the United States Trade Representative
600 17<sup>th</sup> Street, N.W.
Washington, DC 20508

Re: Steel, Investigation No. TA-201-73; Exclusion Request X-081, Special-Quality Oil Field Equipment Steel

Dear Ms. Blue:

We are filing this submission on behalf of our client Corus Group plc, with the cooperation of the law firm of deKieffer & Horgan, on behalf of BGH Edelstahl. This submission supplements the previous exclusion request for special-quality oil field equipment steel (exclusion request X-081).

On January 30, 2002, we met with Richard Weible,
Director, AD/CVD Enforcement Office 8, Department of Commerce, to
discuss the above referenced exclusion request. In this
submission, we address certain information requests made by Mr.
Weible during our meeting.

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First, Mr. Weible requested that we provide a brief, clear definition of the products for which we are seeking exclusion. The definition is:

Stainless Steel Bars, Hot Rolled or Forged, Rough or Smooth Turned AISI 410 (C=0.15% max, Cr=11.5% min). Liquid Quench and Double Tempered. 75,000 PSI Minimum Yield, 95,000 PSI Minimum Tensile, 17% Minimum Elongation. Maximum Hardness RC 22 (241BHN).

Stainless Steel Bars, Hot Rolled or Forged, Rough or Smooth Turned AISI 420 Modified (C=0.15%min, Cr=12%min). Liquid Quench and Double Tempered. 80,000 PSI Yield, 95,000 PSI Minimum Tensile, 18% Minimum Elongation. Maximum Hardness RC 22 (241BHN).

Stainless Steel Bars, Hot Rolled or Forged, Rough or Smooth Turned. (Super 13 Chrome or other like designations.) Chrome 11.5% Min, Nickel=4.0% Min, Molybdenum 1.5% min. Liquid Quench and Tempered. 80,000 PSI Minimum Yield, 95,000 Minimum Tensile, 15% Minimum Elongation.

Second, Mr. Weible requested that we contact counsel for the domestic industry to seek to obtain their agreement to the exclusion of this material. In response to this request, we met with counsel for the domestic industry on February 4, 2002. We understand that counsel for the domestic industry is in the

 $<sup>^{\</sup>scriptscriptstyle 1}$  We are no longer seeking exclusion of AISI 630 17/4 PH DBH 1150.

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process of discussing these issues with their clients with the goal of reaching an agreement. We will keep you informed of the progress of these discussions.

Respectfully Submitted,

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Mark D. Davis Karmi Leiman

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cc: Richard Weible

U.S. Department of Commerce 14<sup>th</sup> Street & Constitution Avenue, N.W. Washington, DC 20230

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